

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

THOMAS NORRIS,)	
)	
Plaintiff,)	07 C 6776
)	
v.)	
)	Judge Guzman
CITY OF CHICAGO,)	
)	Magistrate Judge Ashman
Defendant.)	

**CITY OF CHICAGO’S MOTION TO EXTEND TIME TO ANSWER_
FIRST AMENDED COMPLAINT OR OTHERWISE PLEAD**

Defendant City of Chicago (“City”), by Mara S. Georges, Corporation Counsel for the City of Chicago, respectfully requests that this Honorable Court grant an extension of time up to and including May 16, 2008 in which to answer or otherwise plead to Plaintiff’s Amended Complaint at Law. In support of this motion, the City states as follows:

1. On December 3, 2007, plaintiff filed this lawsuit alleging violations of 42 U.C.S. § 1983 and various state laws.
2. The defendants filed a motion to dismiss the complaint in its entirety. Instead of filing a response to the motion to dismiss, plaintiff filed an amended complaint raising a number of new factual allegations and an entirely new claim.
3. The City’s responsive pleading to the plaintiff’s amended complaint is due to be filed on April 30, 2008.
4. Because the plaintiff has raised a number of new factual allegations, the City will need some additional time to properly respond to the plaintiff’s amended complaint.
5. Plaintiff’s counsel, Martin M. Stack, has agreed to an additional five-day

extension. Given the need to investigate the plaintiff's new allegations and assess the plaintiff's new claim, the defendants will need more than the five days to properly respond the allegations.

WHEREFORE, Defendant, City of Chicago, respectfully requests that it be given until May 16, 2008 to answer or otherwise plead to plaintiff's first amended complaint.

Respectfully submitted,

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